

FILED  
HARRISBURG, PA

OCT 07 2020

DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA ) NO. 1:20-CR-252  
 )  
 v. )  
 ) (J. WILSON )  
 RISHI BUDHADEV, )  
 Defendant ) (Electronically Filed)

INDICTMENT

The Grand Jury Charges:

COUNT ONE  
(Conspiracy to Commit Wire Fraud)

At times material to this Indictment:

**A. BACKGROUND**

1. The defendant, **RISHI BUDHADEV**, was a resident of Virginia.
2. Western Union Financial Services, Inc. ("Western Union") and MoneyGram International ("MoneyGram") were global money transfer companies with more than 750,000 agent-outlets around the World.
3. Mass marketing fraudsters in India, and elsewhere, working in conjunction with fraudsters based in the United States, used the

Western Union and MoneyGram money transfer system to defraud consumers in the United States. In 2015 alone, victims reported to MoneyGram that more than 40,000 money transfers totaling in excess of \$29 million paid in the United States were associated with various common mass marketing scams, including employment scams, government imposter scams (related to government grants or money allegedly owed to the Internal Revenue Service), internet-purchase scams, investment scams, loan scams, person-in-need scams and romance scams.

4. The types of schemes employed by India-based fraudsters are diverse and varied, but they typically entail a common *modus operandi*. Fraudsters contact their victims via the telephone or the internet promising attractive loans, grants, investments, or merchandise, posing as a relative in need of emergency financial assistance, or threatening legal action or incarceration for failing to pay amounts owed the IRS or the Social Security Administration. The fraudsters induce victims to send money via MoneyGram and Western Union money transfers, cash, pre-paid cards, remote bank deposits, or bank wires in order to receive the promised loan, grant,

merchandise, and investment return, to help a friend or acquaintance, or to avoid incarceration and loss of government benefits. Victims then provide their MoneyGram and Western Union money transfer information to the fraudsters, and either those fraudsters or their co-conspirators collect the transfers at MoneyGram or Western Union agent locations.

5. To help perpetrate their frauds, India-based fraudsters employ co-conspirators in the United States known as “money mules.” Money mules receive fraud-induced money transfers, checks, and cash sent by victims, and then forward the proceeds to their co-conspirator fraudsters in India. In some instances, fraudsters direct victims to send multiple money transfers payable to different money mules. By playing the role of a middleman, a money mule thus helps fraudsters to conceal ownership and control of the fraud proceeds. A money mule is typically compensated for his or her services by retention of an agreed upon percentage or amount of the fraud proceeds, from which he or she will take a cut before forwarding the majority of the proceeds via Western Union or MoneyGram.

**B. THE CONSPIRACY**

6. From about October 2015 until about December 2015, in the Middle District of Pennsylvania, and elsewhere, the defendant,

**RISHI BUDHADEV,**

did knowingly conspire and agree, together and with other persons both known and unknown to the Grand Jury, to commit offenses against the United States and to defraud the United States, that is, by devising a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises and by willfully participating in such a scheme and artifice with knowledge of its fraudulent nature, with the intent to defraud, and for the purpose of executing such scheme and artifice causing to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, any writing, sign, signal, picture and sound, in violation of Title 18, U.S.C. § 1343.

**C. MANNER AND MEANS OF THE CONSPIRACY**

7. The co-conspirators, known and unknown to the Grand Jury, employed the following manner and means in furtherance of the conspiracy and to effect the objects of the conspiracy:

8. It was part of the conspiracy that from about October 2015 until about December 2015, the defendant, **RISHI BUDHADEV**, and other unindicted co-conspirators received consumer fraud-induced MoneyGram and Western Union money transfers and bank wires from victims across the United States totaling more than \$500,000. MoneyGram money transfer sender victims reported that approximately 48 money transfers sent and paid to the defendant, **RISHI BUDHADEV**, totaling approximately \$83,000, were fraud-induced.

9. It was further part of the conspiracy that defendant, **RISHI BUDHADEV**, received the following Western Union and MoneyGram money transfers from about October 2015 until about December 2015:

On or About	Approximate Number of Money Transfer Payouts to BUDHADEV	Approximate Dollar Value of Money Transfer Payouts to BUDHADEV
10/9/2015	5	\$5,515
10/10/2015	5	\$8,011

10/12/2015	1	\$200
10/13/2015	10	\$13,781
10/14/2015	5	\$8,220
10/15/2015	11	\$13,200
10/16/2015	6	\$12,940
10/20/2015	6	\$13,911
10/23/2015	4	\$6,380
10/24/2015	1	\$1,875
10/26/2015	1	\$2,000
10/27/2015	2	\$4,785
10/28/2015	3	\$3,650
10/29/2015	2	\$1,636
10/30/2015	11	\$18,091
10/31/2015	7	\$4,353
11/2/2015	3	\$6,074
11/3/2015	7	\$8,273
11/4/2015	3	\$3,475
11/5/2015	3	\$2,275

11/9/2015	6	\$3,698
11/10/2015	18	\$22,060
11/11/2015	1	\$680
11/12/2015	15	\$22,230
11/13/2015	18	\$31,002
11/14/2015	1	\$1,750
11/16/2015	8	\$8,880
11/17/2015	4	\$5,450
11/18/2015	5	\$7,237
11/19/2015	3	\$3,662
11/20/2015	11	\$10,165
11/21/2015	21	\$14,806
11/22/2015	1	\$800
11/23/2015	8	\$4,240
11/24/2015	18	\$20,465
11/25/2015	26	\$18,858
11/26/2015	5	\$5,672
11/27/2015	16	\$15,668

11/28/2015	16	\$11,607
11/29/2015	1	\$1,100
11/30/2015	15	\$21,863
12/1/2015	5	\$2,228
12/2/2015	11	\$13,034
12/3/2015	49	\$24,551
12/4/2015	54	\$41,173
12/5/2015	17	\$12,218
12/7/2015	22	\$20,095
12/8/2015	5	\$4,098
12/10/2015	3	\$5,444
12/11/2015	5	\$6,820
12/16/2015	4	\$10,425
12/18/2015	1	\$1,530
<b><u>TOTAL</u></b>	<b><u>489</u></b>	<b><u>\$512,150</u></b>

10. It was further part of the conspiracy that the defendant, **RISHI BUDHADEV**, regularly visited Walmart stores—including multiple Walmart locations within the same day—in order to receive



fraudulent Moneygram money transfers sent by advance-fee scam victims.

11. It was further part of the conspiracy that on or about October 15, 2015, C.S., a widow who was then approximately 72 years old, became the victim of an advance-fee government grant scam. On or about that date, she was told by a person impersonating a U.S. Government agent that she qualified for a federal grant because of her late husband's military service. In order to redeem these benefits, C.S. sent, as directed by the impersonator, a MoneyGram money transfer worth approximately \$456 payable to the defendant, **RISHI BUDHADEV**, from the area of South Williamsport, Lycoming County, Pennsylvania. The money transfer proceeds were paid to the defendant, **RISHI BUDHADEV**, the same day in Richmond, Virginia. C.S. was then told that she needed to send additional monies to redeem the grant benefits, which she declined to do.

12. It was further part of the conspiracy that on or about November 13, 2015, at approximately five different Walmart stores in and around Richmond, Virginia, the defendant, **RISHI**

**BUDHADEV**, picked up approximately 13 MoneyGram money transfers totaling approximately \$27,051.

13. It was further part of the conspiracy that on or about November 16, 2015, J.D. sent a MoneyGram money transfer worth approximately \$300 payable to the defendant, **RISHI BUDHADEV**, from the area of Saint Clair, Schuylkill County, Pennsylvania. The money transfer proceeds were paid to the defendant, **RISHI BUDHADEV**, the same day in Richmond, Virginia.

14. It was further part of the conspiracy that on December 4, 2015, at approximately five different Walmart stores in and around Richmond, Virginia, the defendant **RISHI BUDHADEV** picked up approximately 38 MoneyGram money transfers totaling approximately \$34,370.

15. It was further part of the conspiracy that from about October 13, 2015 until about December 7, 2015, the defendant, **RISHI BUDHADEV**, picked up approximately 28 MoneyGram money transfers at Walmart stores that were valued at \$3,000 or more. The Walmart store associates alternately listed **RISHI BUDHADEV's** occupation as "student," "IT Professional," and "Hotel Owner."

16. It was further part of the conspiracy that from about October 9, 2015 until about December 18, 2015, the defendant **RISHI BUDHADEV** picked up approximately 310 MoneyGram money transfers totaling approximately \$407,101 from more than 250 different senders from more than 40 different states and provinces at approximately seven different Walmart stores.

**All in violation of Title 18, United States Code, Sections 1349.**

The Grand Jury Further Charges:

**COUNTS TWO AND THREE**  
(Wire Fraud)

17. For purposes of Counts 2 and 3, paragraphs 7 through 16 are incorporated as if fully set forth herein.

18. On or about the dates set forth below, in the Middle District of Pennsylvania, and elsewhere, the defendant,

**RISHI BUDHADEV,**

aiding and abetting other persons both known and unknown to the Grand Jury, and with the intent to defraud, did devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and did

willfully participate in such a scheme and artifice with knowledge of its fraudulent nature, and for the purpose of executing such scheme and artifice did cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, any writing, sign, signal, picture and sound, as described below:

<b>Count</b>	<b>On or About</b>	<b>Sender and Location</b>	<b>Recipient and Location</b>	<b>Wire</b>
2	10/15/2015	C.S., South Williamsport, PA	<b>RISHI BUDHADEV</b> , Richmond, VA	\$456 MoneyGram Money Transfer
3	11/16/2015	J.D., Saint Clair, PA	<b>RISHI BUDHADEV</b> , Richmond, VA	\$300 MoneyGram Money Transfer

**All in violation of Title 18, United States Code, Sections 1343 and 2.**

The Grand Jury Further Charges:

### **NOTICE OF FORFEITURE**

19. Paragraphs 1 through 18 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(8),

Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

20. Upon conviction of the offense in violation of Title 18, United States Code, Section 1349 set forth in Count One of this Indictment, or the offenses in violation of Title 18, United States Code, Section 1343 set forth in Counts Two and Three of this Indictment, the defendant,

**RISHI BUDHADEV,**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(8), Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any real or personal property: (a) used or intended to be used to commit, to facilitate, or to promote the commission of such offense; and (b) constituting, derived from, or traceable to the gross proceeds obtained directly or indirectly as a result of such offense. The property to be forfeited includes, but is not limited to the following:

- a. approximately \$512,150.00 in United States Currency, representing proceeds obtained as a result of the offenses.

21. If any of the property described above, as a result of any act or omission of the defendant, **RISHI BUDHADEV**:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 982(a)(8), Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c) .

A TRUE BILL

  
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Grand Jury Foreperson

DAVID J. FREED  
United States Attorney



RAVI ROMEL SHARMA  
Assistant United States Attorney

Date: 10/7/2020